

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
KEBE STUDIOS LLC,

Defendants.

Case No. 1:19-cv-01301-WMR

**PLAINTIFF’S MOTION
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) moves this Court, pursuant to Fed. R. Civ. P. 5.2(d) and 26(c), the parties’ Consent Protective Order (ECF No. 53), and Section II.J. to Appendix H of this Court’s Local Rules, for an Order permitting Plaintiff to file certain documents under seal.

This Court is permitted, for good cause, to shield the disclosure of confidential information from the public record. *See* Fed. R. Civ. P. 26(c). On September 17, 2020, this Court previously entered the Consent Protective Order in this case providing for the filing of documents under seal. (*See* ECF No. 53.)

In connection with Plaintiff's motion for summary judgment, Plaintiff is filing transcript excerpts from the depositions of Defendant Latasha Kebe and her husband and business manager Cheickna Kebe. In accordance with the Local Rules, Plaintiff also will need to file these deposition transcripts in their entirety. These transcripts contain or reference information that Defendant Kebe has designated as "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS EYES ONLY." For this reason, Plaintiff respectfully requests permission to file the transcripts and transcript excerpts under seal. To the extent Kebe wishes for the transcript excerpts and transcripts to remain "Confidential," it is Kebe's ultimate burden to establish good cause for sealing. (*See* Section II.J.2.e. to Appendix H of this Court's Local Rules.)

Plaintiff also is filing a declaration from attorney of record Lisa Moore that includes Plaintiff's medical records as exhibits (the "Declaration"). These medical records, Exhibits 1 and 2 of the Declaration, are highly confidential and are designated as such under the Consent Protective Order. Accordingly, Plaintiff respectfully requests permission to file the Declaration with the exhibits under seal.

For the foregoing reasons, Plaintiff respectfully requests that this Court grant her motion to file the documents listed above under seal.

Dated: December 30, 2020

Respectfully submitted,

/s/ W. Andrew Pequignot

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Attorneys for Plaintiff

CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

/s/ W. Andrew Pequignot

W. Andrew Pequignot

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2020, I electronically filed the foregoing PLAINTIFF'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/ W. Andrew Pequignot
W. Andrew Pequignot